

# EXHIBIT 37

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

LATOYA BROWN; LAWRENCE  
BLACKMON; HERBERT ANTHONY  
GREEN; KHADAFY MANNING;  
QUINNETTA MANNING; MARVIN  
MCFIELD; NICHOLAS SINGLETON;  
STEVEN SMITH; BESSIE THOMAS; and  
BETTY JEAN WILLIAMS TUCKER,  
individually and on behalf of a class of all  
others similarly situated,

Plaintiffs,

v.

MADISON COUNTY, MISSISSIPPI;  
SHERIFF RANDALL S. TUCKER, in his  
official capacity; and MADISON COUNTY  
SHERIFF'S DEPUTIES JOHN DOES #1  
through #6, in their individual capacities,

Defendants.

Civil Action No.  
3:17-cv-00347-WHB-LRA

**DECLARATION OF JAMES  
BACON**

I, JAMES BACON, declare the following under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. My name is James Bacon. I am a 58-year-old Black man. I live in Camden, Mississippi. I have had a convenience store in Camden for 17 years.
2. Madison County Sheriff's Department sets up roadblocks in Camden two to three times a month. They often set up roadblocks when there are events in town, like a local football game.
3. MCSD also sets up roadblocks down the road from my business both ways so that people can't leave my business without passing through a roadblock.

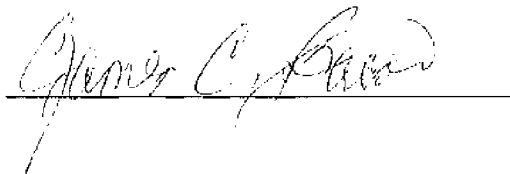
4. Two or three years ago I drove through a roadblock on Highway 51 and Morgan Road. The officers asked for my ID and registration. After running my driver's license, they told me they had a warrant for me. I explained that they must be wrong, but they arrested me anyway.

5. I paid about \$1,400 to get out of jail.

6. I later found out they had arrested me for a crime allegedly committed by my son. But my son had died three years earlier. And while he and I had the same name, we have different birthdays. I do not know why they would have told me there was a warrant for my arrest based on my driver's license.

7. I believe that the MCSD sets up roadblocks in my community because the residents are majority Black. They interfere with my business and our community when we gather together because we are black.

I declare under penalty of perjury that the statements above are true and correct.



10-24-17

Date

# EXHIBIT 38

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

LATOYA BROWN; LAWRENCE  
BLACKMON; HERBERT ANTHONY  
GREEN; KHADAFY MANNING;  
QUINETTA MANNING; MARVIN  
MCFIELD; NICHOLAS SINGLETON;  
STEVEN SMITH; BESSIE THOMAS; and  
BETTY JEAN WILLIAMS TUCKER,  
individually and on behalf of a class of all  
others similarly situated,

Plaintiffs,

v.

MADISON COUNTY, MISSISSIPPI;  
SHERIFF RANDALL S. TUCKER, in his  
official capacity; and MADISON COUNTY  
SHERIFF'S DEPUTIES JOHN DOES #1  
through #6, in their individual capacities,

Defendants.

Civil Action No.  
3:17-cv-00347-WHB-LRA

**DECLARATION OF MICHAEL  
BRACY**

I, MICHAEL BRACEY, declare the following under penalty of perjury pursuant to 28 U.S.C. §  
1746:

1. My name is Michael Bracey. I am a 53-year-old Black man. I live in Kearney  
Park, Mississippi. I have lived here since I was five years old. I was formerly employed as a  
truck driver.

2. In March 2012, around 11:30 p.m., I was driving home from my neighbor's house  
four houses down the street. I drove around the block and stopped at the stop sign, waiting to  
make a right turn onto my street.

10/21/17 2:16 PM

**PL-MCSD 0000045**

3. At that time, an officer from the Madison County Sheriff's Department drove past me, driving the opposite direction. I made my turn, pulled onto my property, and drove behind my house where I always park my car.

4. As I was getting out of my car, I saw the same officer pull onto my property, over my grass and behind my house. He jumped out of his car, pulled out his gun, and started screaming and cursing at me to get down onto the ground.

5. I lay down on the ground on my stomach and he continued to yell at me. He put handcuffs on me. He put his knee on my back and placed his gun against the back of my head. I feared for my life.

6. I tried to explain to him that this was my house that I had pulled into. He made so much noise that the preacher who lived across the street came over to see what was happening and try to help me.

7. The officer proceeded to search me and search my car. He arrested me.

8. When I asked the officer why he was arresting me, he told me that I was driving without a seatbelt. He also told me that I was evading the police.

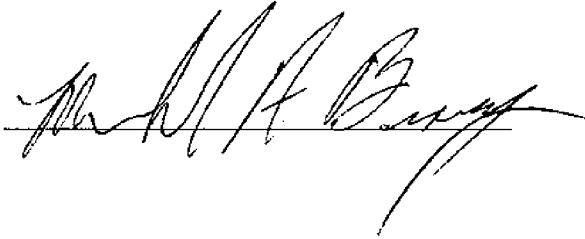
9. The officer then tried to drive me to the Madison County Detention Center. But, because he was driving so quickly he drove off the driveway and got stuck in a ditch on my lawn. He then called for backup and a tow truck. Eventually I was taken to MCDC.

10. I know that I was wearing my seatbelt. I also was not evading the police – I was pulling into my driveway. I believe he came after me because I am black.

11. It took me two years of going to court to fight these false charges.

12. I don't drive much anymore because I am afraid of the MCSD and what could happen if they pull me over again. I am afraid they will target me again. I no longer can work as a truck driver. Whenever I see an MCSD officer I am shaking nervous.

I declare under penalty of perjury that the statements above are true and correct.



10/21/17  
Date

7

10/21/17 2:16 PM

PL-MCSD 0000047

# EXHIBIT 39

EXHIBIT I



**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

LATOYA BROWN; LAWRENCE  
BLACKMON; HERBERT ANTHONY  
GREEN; KHADAFY MANNING;  
QUINETTA MANNING; MARVIN  
MCFIELD; NICHOLAS SINGLETON;  
STEVEN SMITH; BESSIE THOMAS; and  
BETTY JEAN WILLIAMS TUCKER,  
individually and on behalf of a class of all  
others similarly situated,

Plaintiffs,

v.

MADISON COUNTY, MISSISSIPPI;  
SHERIFF RANDALL S. TUCKER, in his  
official capacity; and MADISON COUNTY  
SHERIFF'S DEPUTIES JOHN DOES #1  
through #6, in their individual capacities,

Defendants.

Civil Action No.  
3:17-cv-00347-WHB-LRA

**DECLARATION OF ANTHONY  
BROWN**

I, ANTHONY BROWN, declare the following under penalty of perjury pursuant to 28 U.S.C. §  
1746:

1. My name is Anthony Brown, Sr. I am a 43-year-old Black man. I live in  
Kearney Park, Mississippi. I have lived here all my life.
2. In 2014, around 9:30 p.m., I was driving home from my grandmother's house and  
I was stopped at a Madison County Sheriff's Department roadblock.
3. The officer had parked his car off the side of the road and turned off the lights.  
He signaled to me to pull over with a flashlight.

4. I provided the officer with my license and registration, but he directed me to step out of the car.

5. He searched me. He then searched my entire truck.

6. I was pulled over for more than 30 minutes. After he searched me and my car he told me he believed I smelled like marijuana and someone else would need to drive home.

7. The MCSD regularly sets up roadblocks at the entrance of the Magnolia Heights community in Kearney Park. Recently, there have been roadblocks set up more than once a week.

8. I believe I was stopped without good cause and subjected to discriminatory treatment on the basis of my race.

9. I believe that the MCSD sets up its roadblocks in my community because the residents are Black.

I declare under penalty of perjury that the statements above are true and correct.

Ante B. Jr.

10/21/2017

Date

# EXHIBIT 40

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

LATOYA BROWN; LAWRENCE  
BLACKMON; HERBERT ANTHONY  
GREEN; KHADAFY MANNING;  
QUINNETTA MANNING; MARVIN  
MCFIELD; NICHOLAS SINGLETON;  
STEVEN SMITH; BESSIE THOMAS; and  
BETTY JEAN WILLIAMS TUCKER,  
individually and on behalf of a class of all  
others similarly situated,

Plaintiffs,

v.

MADISON COUNTY, MISSISSIPPI;  
SHERIFF RANDALL S. TUCKER, in his  
official capacity; and MADISON COUNTY  
SHERIFF'S DEPUTIES JOHN DOES #1  
through #6, in their individual capacities,

Defendants.

Civil Action No.  
3:17-cv-00347-WHB-LRA

**DECLARATION OF BYSHEBA  
BROWN**

I, BYSHEBA BROWN, declare the following under penalty of perjury pursuant to 28 U.S.C. §  
1746:

1. My name is Bysheba Brown. I am a 28-year-old Black woman. I live in  
Ridgeland, Mississippi in the Pine Knoll neighborhood. I grew up in Canton, Mississippi.
2. Since moving to Ridgeland I have seen around five roadblocks at the entrance to  
my neighborhood while I was driving.
3. Madison County Sheriff's Department comes to my neighborhood with as many  
as four cars. They park in the parking lots to the left and right of the entrance and turn off all  
their lights. Then one or two officers stand in the street.

10/25/17 2:22 PM

**PL-MCSD 0000050**

4. The officers look like pedestrians until they start waving their flashlights to signal cars to stop.

5. Each time I have been stopped the officers have shone their flashlights around the inside of my car and then asked for my license. I gave them my license and they let me pass through.

6. In the time I have lived in Ridgeland I have only seen roadblocks on Pine Knoll street.

7. I don't believe the officers had any reason to stop me. I believe they set up roadblocks on Pine Knoll because they know that is the entrance to a community where Black people live.

8. When I lived in Canton I believe I drove through more than 100 roadblocks. I don't believe the officers had any reason to stop me.

9. At one stop, as I looked through my purse for my license, the officer who stopped me rifled through my purse himself, and pulled out a ziploc bag of makeup and inspected it.

10. I believe the MCSD engages in discriminatory policing toward black people. In Canton and Ridgeland MCSD only sets up roadblocks in Black neighborhoods.

I declare under penalty of perjury that the statements above are true and correct.

Sydney B.

10-25-2017

Date

# EXHIBIT 41

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

LATOYA BROWN; LAWRENCE  
BLACKMON; HERBERT ANTHONY  
GREEN; KHADAFY MANNING;  
QUINNETTA MANNING; MARVIN  
MCFIELD; NICHOLAS SINGLETON;  
STEVEN SMITH; BESSIE THOMAS; and  
BETTY JEAN WILLIAMS TUCKER,  
individually and on behalf of a class of all  
others similarly situated,

Plaintiffs,

v.

MADISON COUNTY, MISSISSIPPI;  
SHERIFF RANDALL S. TUCKER, in his  
official capacity; and MADISON COUNTY  
SHERIFF'S DEPUTIES JOHN DOES #1  
through #6, in their individual capacities,

Defendants.

Civil Action No.  
3:17-cv-00347-WHB-LRA

**DECLARATION OF WILLIE  
CARTER**

I, WILLIE CARTER, declare the following under penalty of perjury pursuant to 28 U.S.C. §  
1746:

1. My name is William Carter. I am a 69-year-old Black man. I have lived in Camden since 1957.
2. Madison County Sheriff's Department sets up roadblocks in Camden more than once a month. They pull off on the side of the road and turn off all their lights. Then once the driver is coming into the intersection MCSD pulls you over with a flashlight.
3. I have been stopped at roadblocks in Camden six times. Each time I was asked for my license, registration, and proof of insurance.

**PL-MCSD 0000052**

4. Last year I went through two roadblocks within thirty minutes.

5. I think they set up roadblocks in Camden because they are targeting a black area.

Whenever they get word of Black people gathering together at a celebration or a wedding they set up a roadblock.

6. Even though I am licensed and have all the correct documents I am always concerned about running into a roadblock. I drive less because I don't want to be stopped at a roadblock.

I declare under penalty of perjury that the statements above are true and correct.

Amelia Fletcher

10/24/17

Date



# EXHIBIT 42

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

LATOYA BROWN; LAWRENCE  
BLACKMON; HERBERT ANTHONY  
GREEN; KHADAFY MANNING;  
QUINNETTA MANNING; MARVIN  
MCFIELD; NICHOLAS SINGLETON;  
STEVEN SMITH; BESSIE THOMAS; and  
BETTY JEAN WILLIAMS TUCKER,  
individually and on behalf of a class of all  
others similarly situated,

Plaintiffs,

v.

MADISON COUNTY, MISSISSIPPI;  
SHERIFF RANDALL S. TUCKER, in his  
official capacity; and MADISON COUNTY  
SHERIFF'S DEPUTIES JOHN DOES #1  
through #6, in their individual capacities,

Defendants.

Civil Action No.  
3:17-cv-00347-WHB-LRA

**DECLARATION OF RASHEID  
DAVIS**

I, RASHEID DAVIS, declare the following under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. My name is Rasheid Davis. I am a 40-year-old Black man. I have been a business owner in Canton for 8 years. I have a barber shop, a boutique, and a restaurant.
2. I have seen almost 40 roadblocks set up by the Madison County Sheriff's Department in the last year. Sometimes there are roadblocks up in Canton every night.
3. A typical roadblock is at least four officers with cars pulled over to the side of the road with the lights off. Then the officers stand in the middle of the road and shine their flashlights into drivers' cars.

4. In the last year I have passed through about five roadblocks.

5. Two weeks ago I was stopped at roadblock on my way home from work. I gave the officer my license but I couldn't find my insurance card immediately. The officer wouldn't give me any time to look.

6. Instead, he directed me to get out the car and started searching around in my car. He patted me down.

7. The officer kept insisting that I smoke, even though I repeatedly told him that I do not. He gave me a sobriety test, which I passed.

8. I asked if I could leave or what else I needed to do to be able to go home. He told me to stop "smoking dope." I think he said that to me because I am black.

9. The roadblocks also hurt my businesses.

10. Once the roadblocks go up in Canton people stop coming to my stores. The officers stop people driving to my store, or even just walking. Because people don't want to be harassed they just stay home.

11. I believe the MCSD engages in discriminatory policing. I have been stopped for no cause, harassed and roadblocks, and had my businesses harmed because I am a black man and I work in a black neighborhood.

I declare under penalty of perjury that the statements above are true and correct.



10/24/17

Date

# EXHIBIT 43

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

LATOYA BROWN; LAWRENCE  
BLACKMON; HERBERT ANTHONY  
GREEN; KHADAFY MANNING;  
QUINETTA MANNING; MARVIN  
MCFIELD; NICHOLAS SINGLETON;  
STEVEN SMITH; BESSIE THOMAS; and  
BETTY JEAN WILLIAMS TUCKER,  
individually and on behalf of a class of all  
others similarly situated,

Plaintiffs,

v.

MADISON COUNTY, MISSISSIPPI;  
SHERIFF RANDALL S. TUCKER, in his  
official capacity; and MADISON COUNTY  
SHERIFF'S DEPUTIES JOHN DOES #1  
through #6, in their individual capacities,

Defendants.

Civil Action No.  
3:17-cv-00347-WHB-LRA

**DECLARATION OF VERONICA  
DAVIS**

I, VERONICA DAVIS, declare the following under penalty of perjury pursuant to 28 U.S.C. §  
1746:

1. My name is Veronica Davis. I am 37-year-old a Black woman. I live in Canton Estates in Canton, Mississippi with my four children.
2. The Madison County Sheriff Department regularly sets up roadblocks at the entrance to my neighborhood. I believe they set up the roadblocks in Canton Estates because the people who live here are Black.

3. In 2014, I was stopped by two officers at a roadblock when I was driving home with my daughter. The officers had no justification to stop me. I believe I was the subject of discriminatory policing by the MCSD.

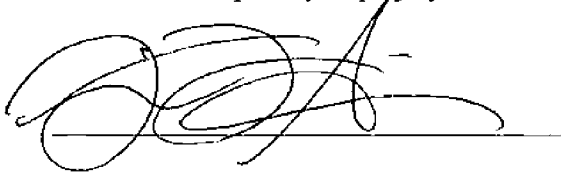
4. I did not have my license, but I handed one of the officers my Mississippi state ID.

5. While I was pulled over, another driver drove through the roadblock without stopping. Both of the officers then got in their car and drove after that driver. They took my ID with them. I was never given a ticket or a summons.

6. A year later, six uniformed MCSD officers came to my door and told me they had a warrant to arrest me. I didn't understand why. They told me it was for failure to pay a ticket for driving without a license or insurance.

7. I spent three days away from my children in jail until my sister was able to pay the money for the tickets so I could come home.

I declare under penalty of perjury that the statements above are true and correct.

A handwritten signature in black ink, consisting of a series of loops and a long horizontal stroke at the end.

Oct 22, 2017

Date

# EXHIBIT 44

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

LATOYA BROWN; LAWRENCE  
BLACKMON; HERBERT ANTHONY  
GREEN; KHADAFY MANNING;  
QUINNETTA MANNING; MARVIN  
MCFIELD; NICHOLAS SINGLETON;  
STEVEN SMITH; BESSIE THOMAS; and  
BETTY JEAN WILLIAMS TUCKER,  
individually and on behalf of a class of all  
others similarly situated,

Plaintiffs,

v.

MADISON COUNTY, MISSISSIPPI;  
SHERIFF RANDALL S. TUCKER, in his  
official capacity; and MADISON COUNTY  
SHERIFF'S DEPUTIES JOHN DOES #1  
through #6, in their individual capacities,

Defendants.

Civil Action No.  
3:17-cv-00347-WHB-LRA

**DECLARATION OF DEMARIO  
DAY**

I, Delores Smith, declare the following under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. My name is Demario Day. I am a 26-year-old Black man. I live in the Madison Heights apartment complex. I have lived here since the 6<sup>th</sup> grade.
2. I have been stopped by the MCSD jump out patrol more than ten times.
3. The MCSD drives into my apartment complex in unmarked cars. When they see young people outside they ask for our driver's licenses. If I don't have my driver's license they ask me for my social security number.
4. Then, they check every one for outstanding warrants. Because I don't have any, they just leave.



5. I don't know why they are asking for my driver's license. I am not driving and I'm not doing anything illegal. I am simply standing outside my apartment.

6. They are intimidating. I don't want to give them my license or social security number, but I feel that I am required to. I fear what would happen to me if I refused or walked away .

7. I think the MCSD patrols Madison Heights because this is where black people live. I believe MCSD targets, harasses, and discriminates against Black people.

Demaris Day

2/6/18  
Date

# EXHIBIT 45

EXHIBIT O

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

LATOYA BROWN; LAWRENCE  
BLACKMON; HERBERT ANTHONY  
GREEN; KHADAFY MANNING;  
QUINNETTA MANNING; MARVIN  
MCFIELD; NICHOLAS SINGLETON;  
STEVEN SMITH; BESSIE THOMAS; and  
BETTY JEAN WILLIAMS TUCKER,  
individually and on behalf of a class of all  
others similarly situated,

Plaintiffs,

v.

MADISON COUNTY, MISSISSIPPI;  
SHERIFF RANDALL S. TUCKER, in his  
official capacity; and MADISON COUNTY  
SHERIFF'S DEPUTIES JOHN DOES #1  
through #6, in their individual capacities,

Defendants.

Civil Action No.  
3:17-cv-00347-WHB-LRA

**DECLARATION OF  
DOMUNIQUE DOSS**

I, DOMUNIQUE DOSS, declare the following under penalty of perjury pursuant to 28 U.S.C. §  
1746:

1. My name is DomunIQUE Doss. I am a 31-year-old Black man. I live in Jackson, Mississippi.
2. My grandparents have lived in Flora for 60 years. I travel to Madison County to visit them. Sometimes as often as three times a day.
3. The Madison County Sheriff's Department regularly sets up roadblocks outside of the Black community in Flora. They frequently set up on the weekends. They also set up on holidays or when there are events like birthday parties.

10/25/17 11:14 AM

**PL-MCSD 0000058**

4. When people have parties or family gatherings at the volunteer community center, the officers frequent set up roadblocks to harass the people coming and going from these events.

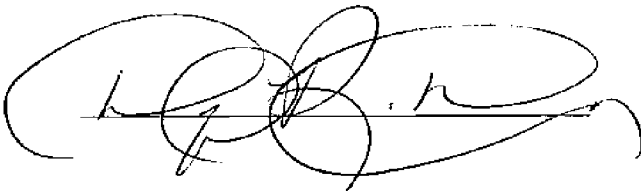
5. On numerous occasions I have missed family gatherings because I did not want to have to pass through a roadblock.

6. I have been stopped twice at the MCSD roadblocks, in 2010 and 2012. On both occasions I was asked for my driver's license but didn't have it in the car.

7. I was then directed to get out of my car and was searched. The officer searched in my clothes and my pants pockets and even asked me to take off my shoes. He also searched in my car.

8. I don't believe the officer had any reason to stop me. I believe I was only stopped because I was black.

I declare under penalty of perjury that the statements above are true and correct.

A handwritten signature in black ink, appearing to read "L. G. D. H.", written over a horizontal line.

10/25/2017  
Date

# EXHIBIT 46

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

LATOYA BROWN; LAWRENCE  
BLACKMON; HERBERT ANTHONY  
GREEN; KHADAFY MANNING;  
QUINNETTA MANNING; MARVIN  
MCFIELD; NICHOLAS SINGLETON;  
STEVEN SMITH; BESSIE THOMAS; and  
BETTY JEAN WILLIAMS TUCKER,  
individually and on behalf of a class of all  
others similarly situated,

Plaintiffs,

v.

MADISON COUNTY, MISSISSIPPI;  
SHERIFF RANDALL S. TUCKER, in his  
official capacity; and MADISON COUNTY  
SHERIFF'S DEPUTIES JOHN DOES #1  
through #6, in their individual capacities,

Defendants.

Civil Action No.  
3:17-cv-00347-WHB-LRA

**DECLARATION OF UNDREA  
GUISE**

I, UNDREA GUISE, declare the following under penalty of perjury pursuant to 28 U.S.C. §  
1746:

1. My name is Undrea Guise. I am a Black woman. I live in Canton Estates in  
Canton, Mississippi.
2. In September 2016, the Madison County Sheriff's Department set up a roadblock  
around 9 a.m. with three or four officers on North Liberty by the Fire Department.
3. The officers directed me to stop and asked me for my license and insurance.  
Because I didn't have insurance I was issued a ticket with a very large fine.
4. I do not believe the officers had any reason to stop me.

5. I live near the entrance of Canton Estates. I have seen the MCSD set up roadblocks at the entrance of the community sometimes as often as once a week.

6. I also have seen MCSD officers driving in unmarked vehicles and jumping out and stopping Black drivers.

7. Because of the roadblocks and the jump out patrol I am afraid to drive and I don't leave my house as often as I would like.

8. The two times I have called the MCSD for help, they have refused to help me.

9. I called the MCSD because my car was broken into and my radio was stolen. They would not write up a police report.

10. Another time I called the MCSD because a man threatened to kill me and wrote threats on my door. Again, they said they wouldn't help me.

11. I believe that the MCSD sets up its roadblocks in my community because the residents are Black. However, when the residents need help the MCSD is absent.

I declare under penalty of perjury that the statements above are true and correct.

Andrea Awe

10/22/17

Date

# EXHIBIT 47



**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

LATOYA BROWN; LAWRENCE  
BLACKMON; HERBERT ANTHONY  
GREEN; KHADAFY MANNING;  
QUINNETTA MANNING; MARVIN  
MCFIELD; NICHOLAS SINGLETON;  
STEVEN SMITH; BESSIE THOMAS; and  
BETTY JEAN WILLIAMS TUCKER,  
individually and on behalf of a class of all  
others similarly situated,

Plaintiffs,

v.

MADISON COUNTY, MISSISSIPPI;  
SHERIFF RANDALL S. TUCKER, in his  
official capacity; and MADISON COUNTY  
SHERIFF'S DEPUTIES JOHN DOES #1  
through #6, in their individual capacities,

Defendants.

Civil Action No.  
3:17-cv-00347-WHB-LRA

**DECLARATION OF KENNETH  
HARRIS**

I, KENNETH HARRIS, declare the following under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. My name is Kenneth Harris. I am a 38-year-old Black man. I have lived in Canton, Mississippi about 12 years
2. I have seen countless roadblocks in the time I have lived in Canton. In the last year I have been stopped six roadblocks. Even though I had my license on me, I was directed to exit my vehicle and the officer searched me.
3. On more than one occasion they stopped me and searched me with four-year-old child in the backseat.

4. These stops last as long as 45 minutes.
5. I do not believe the officers had any cause to stop me. I believe they set up the roadblocks in Canton to stop and harass Black people.
6. I have two cars that I drive. However, when I drive my older-model car I am frequently pulled over. The officer asks me where I am going, and asks for my license. I have often asked why I am being pulled over and the officer has always refused to answer.
7. I don't believe the officers have any cause to stop me. I believe that the MCSD targets me when I am driving because they think that my older car means that I am poor and black.

I declare under penalty of perjury that the statements above are true and correct.

Kenneth Harris

10/24/17

Date